

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RICHARD WAYNE WRIGHT, SR.,	)	
AIS # 187140,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 2:05-CV-439-A
	)	
SYLVESTER NETTLES, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT’S MOTION FOR EXTENSION OF TIME FOR  
SUBMISSION OF ITS SPECIAL REPORT AND ANSWER**

COMES NOW Defendant, MHM SERVICES, INC. (“MHM”) incorrectly designated in the complaint as Mental Health Management, and files this Motion for an Extension of Time for Submission of its Special Report and Answer. Defendant respectfully requests an additional thirty days to submit its Special Report, required evidentiary materials (including the affidavits of all pertinent individuals) and Answer. If this motion is granted, the new deadline would be March 5, 2006. As grounds for this motion, Defendant states as follows:

1. On July 27, 2005, Plaintiff filed an Amended Complaint naming fifty-two total defendants, including MHM. Plaintiff alleged that he was denied proper medical treatment, that he was treated improperly and was forced to take medication.

2. MHM was not served until January 10, 2006 and has been ordered to obtain sworn statements of all persons having knowledge of the subject matter. While several affidavits have been attached to the special reports and answers filed by co-defendants, the

undersigned counsel may have to contact additional people. Further, MHM and the undersigned counsel will have to review Plaintiff's medical records.

3. It may be required that undersigned counsel locate former MHM employees to provide an affidavit in this matter.

4. Undersigned counsel is working diligently to comply with the Court's Order requiring Defendant to submit its Special Report and Answer. To properly do so, undersigned counsel hereby requests a thirty day extension to ensure all of the accurate information is gathered.

WHEREFORE, PREMISES CONSIDERED, Defendant MHM respectfully requests that this Honorable Court grant an extension of time allowing Defendant time to file its Special Report, required evidentiary materials and Answer on or before March 5, 2006.

Respectfully submitted this 26<sup>th</sup> day of January, 2006.

Respectfully Submitted,

/s/Gregory F. Yaghmai

ASB-2411-H67G

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of December, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and this is to certify that a copy of the foregoing was served upon the following by placing a copy of same in the United States Mail, first class postage prepaid and properly addressed this 26<sup>th</sup> day of December, 2006:

Inmate Richard Wayne Wright, Sr.  
AIS # 187140  
Ventress Correctional Facility  
P. O. Box 767  
Clayton, AL 36016

/s/Gregory F. Yaghmai

ASB-2411-H67G

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